

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, DC 20554

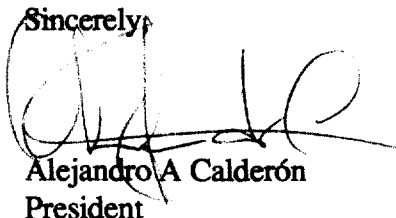
Reference: Additional Comments in Wireless Enhanced 9-1-1 Rulemaking Proceeding  
Regarding "Consensus Agreement" Between Wireless Industry Representatives  
and Public Safety Groups; CC Docket NO. 94-102; RM-8143

Dear Mr. Caton:

DOCKET FILE COPY ORIGINAL

Transmitted herewith for filing are an original and five copies of **Concepts To Operations, Inc. (CTO)** comments regarding the above referenced proceeding. Please contact me if you have any questions about this filing.

Sincerely,

  
Alejandro A. Calderón  
President

No. of Copies rec'd  
List ABCDE

CT 5

C  
O  
N  
C  
E  
P  
T  
S  
  
T  
O  
  
O  
P  
E  
R  
A  
T  
I  
O  
N  
S

RECEIVED March 4, 1996  
MAR - 4 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

**RECEIVED**  
MAR - 4 1996  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

\_\_\_\_\_  
In the Matter of )

Revision of the Commission's rules )  
to ensure compatibility with )  
enhanced 9-1-1 emergency calling systems )  
\_\_\_\_\_

CC DOCKET NO. 94-102

RM-8143

**I. INTRODUCTION**

**Concepts To Operations, Inc.** submits the following comments regarding the subject Notice of Proposed Rule Making regarding revision of the Commission's rules to ensure compatibility with enhanced 9-1-1 emergency calling services. In this proceeding, the Commission has sought to ensure that the public is able to adequately reach and obtain service from emergency police/fire/medical responders when calling from PBX equipment or a wireless telephone device. On February 13, 1996, CTIA, NENA, APCO, and NASNA jointly filed a Consensus Agreement, urging the Commission to adopt their agreement regarding wireless devices in this proceeding. In response to this Consensus Agreement, the Commission seeks additional comments.

**II. COMMENTS**

**Concepts To Operations, Inc.** supports the Consensus Agreement in principal, however, believes that certain factors should be addressed and/or clarified.

**Automatic Number Identification (ANI)**  
**and Automatic Location Information (ALI)**

1. In the footnote #1, to the Comment regarding the Wireless Industry moving the “Phase I” E-9-1-1, CTIA believes 18 months from the FCC’s Adoption of rules “is a realistic time frame for implementation of Phase I.” The Public Safety Communicators (PSCs) “prefer the 12 months suggested in the Notice of Proposed Rulemaking.”

CTO supports the PSCs position that 12 months is the time frame in which the Wireless Industry should be required to move to “Phase I” E-9-1-1 service.

2. Paragraph 3. states: “The Wireless Industry will achieve, during new Phase II -- no longer than 5 years from the FCC’s adoption of rules -- the ability to locate, in latitude and longitude, a wireless caller within 125 meters Root Mean Square (RMS).

The meaning of “will achieve, during Phase II -- no longer than 5 years...” should be clarified to be clear that the Wireless Industry must have functioning systems in place within 5 years, which systems are providing wireless caller location, in latitude and longitude, within 125 meters RMS, to the appropriate local PSAPs.

3. The Consensus Agreement does not address the need for obtaining location information on moving vehicles or persons utilizing a wireless telephone device to call an E-9-1-1 PSAP. Such a requirement is an absolute need for Public Safety personnel. A wireless ALI system

should be capable of providing continuous latitude/longitude information as a caller transverse an area. This need could result from a call from a woman being stalked in her vehicle, a motorist following a drunk driver, or a person on foot following a crime suspect and attempting to report the suspect's location. In any of these situations, it is easy for a person to become disoriented and unable to provide their exact location verbally over their telephone. Public Safety personnel would need to have current, progressive data on the caller's location in order to provide appropriate assistance.

**Concepts To Operations, Inc.** requests that the FCC address this issue in the Final Report and Order on this matter.

### **Selected Additional Issues**

**Equipment labeling (paragraph 55).** E-9-1-1 Service is not currently available in every location within the Country. Unless the Wireless Industry will make ANI and ALI information available to all PSAPS, even those which do not currently have E-9-1-1 systems in place, equipment labeling, as suggested by the FCC in paragraph 55 of the NPRM, would be recommended. It would be unfair to allow a wireless telephone user to have a false sense of security, believing that he or she could be automatically located if they called 9-1-1 in an emergency. Although the Wireless Agreement states that the Wireless Industry will "work on methods and language for customer education that would not depend on equipment labeling," it is CTO's position that labeling is necessary and important. Since a very large

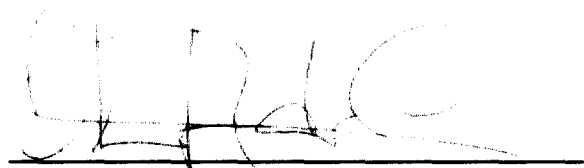
number of cellular telephones are already in use by the general public, it is important to follow through with the other methods of customer education proposed by the Wireless Industry in addition to, rather than in lieu of, product labeling.

Again, **Concepts To Operations, Inc. (CTO)** agrees in principle with the Consensus Agreement between the Wireless Industry and Public Safety Communicators, however, strongly urges the FCC to consider the issues addressed above in the development of its Final Report and Order.

Respectfully submitted,

**CONCEPTS TO OPERATIONS, INC. (CTO)**

By:

A handwritten signature in dark ink, appearing to read 'ALEJANDRO A. CALDERON', written over a horizontal line.

Alejandro A. Calderón  
President  
801 Compass Way, Suite 217  
Annapolis, Maryland 21401

Dated: March 4, 1996

**CERTIFICATE OF SERVICE**

I hereby certify that on this first day of March, 1996, I served a copy of the foregoing Supplemental Comments, regarding the Consensus Agreement between the Wireless Industry and Public Safety Groups in CC Docket No. 94-102, on each of the following persons by placing a copy in the United States Mail, first-class postage prepaid:

THE AD HOC TELECOMMUNICATIONS USERS COMMITTEE.  
THE CALIFORNIA BANKERS CLEARING HOUSE AND  
THE NEW YORK CLEARING HOUSE ASSOCIATION

c/o James S. Blaszak  
Ellen G. Block  
Levine, Blaszak, Block & Boothby  
1300 Connecticut Avenue, N.W.  
Suite 500  
Washington, D.C. 20036

ADCOMM ENGINEERING COMPANY  
c/o Joseph P. Blaschka, Jr., PE  
14631 128th Avenue, N.E.  
Woodinville, WA 98027

ALAMO AREA COUNCIL OF GOVERNMENTS  
c/o Al J. Notzon III  
118 Broadway, Suite 400  
San Antonio, TX 78205

ALLTEL MOBILE COMMUNICATIONS, INC.  
c/o Glenn S. Rabin  
655 15th Street, N.W.  
Suite 220  
Washington, D.C. 20005

AMERICAN MOBILE TELECOMMUNICATIONS ASSOCIATION, INC.  
c/o Elizabeth R. Sachs, Esq.  
1150 18th Street, N.W.  
Suite 250  
Washington, D.C. 20036

AMERICAN PERSONAL COMMUNICATIONS

c/o Kurt A. Wimmer  
Covington & Burling  
1201 Pennsylvania Avenue, N.W.  
P.O. Box 7566  
Washington, D.C. 20044

AMERITECH

c/o Frank Michael Panek  
Room 4H84  
2000 West Ameritech Center Drive  
Hoffman Estates, IL 60196-1025

AMSC SUBSIDIARY CORPORATION

c/o Lon C. Levin  
10802 Park Ridge Boulevard  
Reston, VA 22091

ASSOCIATED GROUP, INC.

c/o William F. Adler  
Steven N. Teplitz  
Fleischman and Walsh  
1400 16th Street, N.W.  
Washington, D.C. 20036

ASSOCIATION OF COLLEGE & UNIVERSITY  
TELECOMMUNICATIONS ADMINISTRATORS

c/o Randal R. Collett  
152 West Zandale Drive  
Suite 200  
Lexington, KY 40503-2486

ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS  
OFFICIALS-INTERNATIONAL, INC.

c/o Robert M. Gurss  
Wilkes, Artis, Hedrick & Lane  
1666 K Street, N.W., #1100  
Washington, D.C. 20006

NATIONAL EMERGENCY NUMBER ASSOCIATION

c/o James R. Hobson  
Donelan, Cleary, Wood & Maser, P.C.  
1100 New York Avenue, N.W. #750  
Washington, D.C. 20005

ADCOMM ENGINEERING COMPANY  
c/o Joe Blaschka  
14631 128th Avenue, N.E.  
Woodlinville, WA 98072

BELL ATLANTIC  
c/o Betsy L. Anderson  
1320 N. Courthouse Road, 8th Floor  
Arlington, VA 22206

BELLSOUTH CORPORATION,  
BELLSOUTH TELECOMMUNICATION, INC.  
BELLSOUTH ENTERPRISES, INC.  
BELLSOUTH CELLULAR CORP.  
c/o Jim O. Llewellyn  
115 Peachtree Street, N.E.  
Atlanta, GA 30309-3610

C.J. DRISCOLL & ASSOCIATES  
2066 Dorado Drive  
Rancho Palos Verdes, CA 90275

CABLE PLUS  
c/o Gary O'Malley  
11400 S.E. 6th Street, Suite 120  
Bellevue, WA 98004

COUNTY OF LOS ANGELES  
c/o Thomas H. Bugbee  
Telecommunications Branch  
Information Technology Services  
P.O. Box 2231  
Downey, CA 90242

DEPARTMENT OF CORRECTIONS  
c/o G. Kevin Carruth  
Planning and Construction Division  
P.O. Box 942883  
Sacramento, CA 94283-0001

CONSTELLATION COMMUNICATIONS, INC.  
c/o Robert A. Mazer  
Albert Shuldiner  
Vinson & Elkins L.L.P.  
1455 Pennsylvania Avenue, N.W.  
Suite 700  
Washington, D.C. 20004-1008



PEOPLE OF THE STATE OF CALIFORNIA AND  
THE PUBLIC UTILITIES COMMISSION OF THE STATE  
c/o Ellen S. Levine  
505 Van Ness Avenue  
San Francisco, CA 94102

NATIONAL ASSOCIATION OF STATE  
EMERGENCY MEDICAL SERVICES DIRECTORS  
c/o Mark S. Johnson  
EMS Communications Committee  
1947 Camino Vida Roble  
Suite 202  
Carlsbad, CA 92008

CELLULAR NETWORKING PERSPECTIVES LTD.  
c/o David Crowe  
636 Toronto Crescent, NW  
Calgary, Alberta T2N 3W1  
CANADA

CELLULAR TELECOMMUNICATIONS  
INDUSTRY ASSOCIATION (CTIA)  
c/o Michael F. Altschul  
1250 Connecticut Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

CMT PARTNERS  
c/o Adam A. Andersen  
651 Gateway Boulevard, 15th Floor  
South San Francisco, CA 94080

COMSAT CORPORATION  
c/o Alicia A. McGlinchey  
22300 Comsat Drive  
Clarksburg, MD 20871

CONSUMERS FIRST AND THE AD HOC  
ALLIANCE FOR PUBLIC ACCESS TO 911  
c/o Jim Conran  
P.O. Box 2346  
Orinda, CA 94563

DEPARTMENT OF DEFENSE

c/o Paul R. Schwedler

Carl W. Smith

TELECOMMUNICATIONS, DOD

DEFENSE INFORMATION SYSTEMS AGENCY

Code DO1

701 S. Courthouse Road

Arlington, VA 22204

E.F. JOHNSON COMPANY

c/o Susan H.R. Jones

GARDNER, CARTON & DOUGLAS

1301 K Street, N.W.

Suite 900, East Tower

Washington, D.C. 20005

ELERT & ASSOCIATES

c/o Ed Hazelwood

140 Third Street South

Stillwater, MN 55082

ERICSSON CORPORATION

c/o David C. Jatlow

Young & Jatlow

Suite 600

2300 N Street, N.W.

Washington, D.C. 20037

ESPN AND ESPN2

c/o Edwin M. Durso

605 Third Avenue

New York, NY 10158-0180

FEDERAL HIGHWAY ADMINISTRATION

U.S. DEPARTMENT OF TRANSPORTATION

c/o Christine Johnson

400 7th Street, S.W.

Washington, D.C. 20590

HILLSBOROUGH COUNTY

OFFICE OF THE COUNTY ADMINISTRATOR

c/o B.J. Smith

P.O. Box 1110

Tampa, FL 33601

LAKE COUNTY INFORMATION SERVICES  
E9-1-1 TELECOMMUNICATIONS  
c/o Bruce E. Thorburn  
P.O. Box 7800  
Taveres, FL 32778-7800

NATIONAL EMERGENCY NUMBER ASSOCIATION (NENA)  
c/o John Schroeder  
8744 Government Drive  
New Port Richey, FL 34654

GE CAPITAL-RESCOM  
c/o Danny E. Adams  
Ann M. Plaza  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

A.P.C.O.-GEORGIA CHAPTER  
c/o James M. Dye  
140 N. Marietta Parkway  
Marietta, GA 30060

CITY OF MARIETTA EMERGENCY COMMUNICATIONS  
c/o Robert L. Williams, Jr.  
112 Haynes Street, Suite 911  
Marietta, GA 30060

NATIONAL EMERGENCY NUMBER ASSOCIATION-  
GEORGIA CHAPTER  
c/o James M. Dye  
140 N. Marietta Parkway  
Marietta, GA 30060

GEOTEK COMMUNICATIONS, INC.  
c/o Susan H.R. Jones  
Gardner, Carton & Douglas  
1301 K Street, N.W.  
Suite 900, East Tower  
Washington, D.C. 20005

GTE  
c/o Andre J. Lachance  
David J. Gudino  
1850 M Street, N.W.  
Suite 1200  
Washington, D.C. 20036

HARRIS CORPORATION  
c/o R. Daniel Foley  
P.O. Box 1188  
Novato, CA 94948-1188

HONG, SCOTT  
667 Arbor Lane  
Warminster, PA 18974

IDB MOBILE COMMUNICATIONS, INC.  
c/o Robert S. Koppel  
Richard S. Whitt  
15245 Shady Grove Road  
Suite 460  
Rockville, MD 20850

ILLINOIS TELEPHONE ASSOCIATION  
c/o John F. Tharp  
P.O. Box 730  
Springfield, IL 62705

INTERNATIONAL COMMUNICATIONS ASSOCIATION  
c/o Brian R. Moir  
Moir & Hardman  
2000 L Street, N.W.  
Suite 512  
Washington, D.C. 20036-4907

INTERAGENCY COMMITTEE ON SEARCH AND RESCUE (ICSAR)  
c/o Chairman Pennington  
United States Coast Guard  
2100 2nd Street, S.W.  
Washington, D.C. 20593-0001

KENTUCKY EMERGENCY NUMBER ASSOCIATION (KENA)  
c/o Jack Y. Sharp  
1240 Airport Road  
Frankfort, KY 40601

KSI INC.  
c/o Charles J. Hinkle, Jr.  
7630 Little River Turnpike  
Suite 212  
Annandale, VA 22003

LIBERTY CELLULAR  
c/o David L. Nace  
Marci E. Greenstein  
Lukas, McGowan, Nace & Gutierrez  
1111 19th Street, N.W.  
12th Floor  
Washington, D.C. 20036

CADDO PARISH COMMUNICATIONS  
DISTRICT NUMBER ONE  
c/o Martha Carter  
1144 Texas Avenue  
Shreveport, LA 71101

DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONAL  
SERVICES EMERGENCY NUMBER SYSTEMS BOARD  
c/o Theodore I. Weintaub  
Suite 209, Plaza Office Center  
6776 Reisterstown Road  
Baltimore, MD 21215-2341

OFFICES OF THE ATTORNEY GENERAL  
c/o Stephen H. Sachs  
Emory A. Plitt, Jr.  
C.J. Messerschmidt  
Munsey Building  
Calvert and Fayette Streets  
Baltimore, MD 21202-1918

MCI TELECOMMUNICATIONS CORP.  
c/o Larry A. Blosser  
Donald J. Elardo  
1801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

JACKSON COUNTY EMERGENCY COMMUNICATIONS  
DISTRICT MISSISSIPPI CHAPTER OF NENA  
c/o Patricia M. Balduf  
600 Convent Avenue  
Pascagoula, MS 39567

MOTOROLA, INC.  
c/o Michael D. Kennedy  
Michael A. Menius  
1350 I Street, N.W.  
Suite 400  
Washington, D.C. 20005

NATIONAL ASSOCIATION OF REGULATORY  
UTILITY COMMISSIONERS  
c/o Paul Rodgers  
P.O. Box 684  
Washington, D.C. 20044

NATIONAL CELLULAR SAFETALK CENTER, INC.  
c/o John Cusack  
385 Airport Road, Suite A  
Elgin, IL 60123

DEPARTMENT OF LAW AND PUBLIC SAFETY  
STATE OFFICE OF THE ATTORNEY GENERAL  
c/o George N. Rover  
Hughes Justice Complex  
CN 080  
Trenton, NJ 08625-0080

NEXTEL COMMUNICATIONS, INC.  
c/o Robert S. Foosaner  
Lawrence R. Krevor  
800 Connecticut Avenue, N.W.  
Suite 1001  
Washington, D.C. 20006

NORTH AMERICAN TELECOMMUNICATIONS ASSOCIATION  
c/o Albert H. Kramer  
Robert F. Aldrich  
Keck, Mahin & Cate  
1201 New York Avenue, N.W.  
Penthouse Suite  
Washington, D.C. 20005-3919

**NATIONAL EMERGENCY NUMBER ASSOCIATION**

c/o Roy D. Meredith  
P.O. Box 429  
High Point, NC 27261-0429

**EMERGENCY SERVICES ADVISORY COMMITTEE**

c/o Lyle V. Gallagher  
P.O. Box 5511  
Bismarck, ND 58502-5511

**NORTHERN TELECOM INC.**

c/o Stephen L. Goodman  
Halprin, Temple & Goodman  
1100 New York Avenue, N.W.  
Suite 650 East  
Washington, D.C. 20005

**NYNEX COMPANIES**

c/o Edward R. Wholl  
Jacqueline E. Holmes Nethersole  
120 Bloomingdale Road  
White Plains, NY 10605

**911 ASSOCIATION OF CENTRAL  
OKLAHOMA GOVERNMENTS**

c/o Zach D. Taylor  
Six Broadway Executive Park  
6600 North Harvey Place  
Suite 200  
Oklahoma City, OK 73116-7913

**OPASTCO**

c/o Lisa M. Zaina  
21 Dupont circle, N.W.  
Suite 700  
Washington, D.C. 20036

**ORBITAL COMMUNICATIONS CORPORATION**

c/o Albert Halprin  
Halprin, Temple & Goodman  
1100 New York Avenue, N.W.  
Suite 650 East  
Washington, D.C. 20005

OREGON STATE POLICE EMERGENCY  
MANAGEMENT DIVISION  
c/o David C. Yandell  
595 Cottage Street, N.E.  
Salem, OR 97310

PACIFIC BELL, NEVADA BELL AND  
PACIFIC BELL MOBILE SERVICES  
c/o James P. Tuthill  
Betsy Stover Granger  
140 New Montgomery Street, Room 1525  
San Francisco, CA 94105

PERSONAL COMMUNICATIONS  
INDUSTRY ASSOCIATION (PCIA)  
c/o Mark J. Golden  
1019 19th Street, N.W.  
Suite 1100  
Washington, D.C. 20036

PERTECH AMERICA, INC.  
c/o Michael J. Celeski  
One Illinois Center  
111 East Wacker Drive  
Suite 500  
Chicago, IL 60601

PRO-WEST & ASSOCIATES  
c/o Philip G. Sailer  
P.O. Box 812  
Walker, MN 56484

PROCTOR  
c/o O.C. Lee  
15050 Northeast 36th  
Redmond, WA 98052-5317

REDCOM LABORATORIES INC.  
c/o Jerome S. Caplan  
One Redcom Center  
Victor, NY 14564-0995



**RURAL CELLULAR ASSOCIATION**

c/o David L. Jones  
2120 L Street, N.W.  
Suite 520  
Washington, D.C. 20037

**SIEMENS ROLM COMMUNICATIONS INC.**

c/o Scott E. Wollaston, Esq.  
P.O. Box 58075  
Santa Clara, CA 95052-8075

**SOUTHWESTERN BELL MOBILE SYSTEMS, INC.**

c/o Bruce E. Beard, Esq.  
17330 Preston Road, Suite 100A  
Dallas, TX 75252

**FOREST A. SOUTHWICK**

107 Bent Twig Road  
Easley, SC 29642-9523

**SPRINGWICH CELLULAR LIMITED PARTNERSHIP**

c/o Jean L. Kiddoo  
Shelley L. Spencer  
Swidler & Berlin  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007

**STANFORD TELECOMMUNICATIONS, INC.**

c/o Herman A. Bustamante  
1221 Crossman Avenue  
Sunnyvale, CA 94089-1117

**STANFORD TELECOMMUNICATIONS, INC.**

c/o Leonard Schuchman  
1761 Business Center Drive  
Reston, VA 22090

**STARSYS GLOBAL POSITIONING, INC.**

c/o Raul R. Rodriguez  
Stephen D. Baruch  
Leventhal, Senter & Lerman  
2000 K Street, N.W., Suite 600  
Washington, D.C. 20006

TELE-COMMUNICATIONS ASSOCIATION

c/o R. Michael Senkowski  
Jeffrey S. Linder  
Ilene T. Weinreich  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

TELECOMMUNICATIONS FOR THE DEAF, INC.

c/o Alfred Sonnenstrahl  
8719 Colesville Road, Suite 300  
Silver Spring, MD 20910

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

c/o Dan Bart  
2500 Wilson Boulevard  
Suite 300  
Arlington, VA 22201

TELIDENT, INC.

c/o Michael J. Miller  
4510 West 77th Street  
Suite 101  
Minneapolis, MN 55435

CARTER COUNTY EMERGENCY COMMUNICATIONS DISTRICT

c/o Russell A. Hopkins  
P.O. Box 999  
Elizabethton, TN 37643

GREENE COUNTY EMERGENCY COMMUNICATIONS DISTRICT

c/o Pete Luttrell  
111 Union Street  
Greeneville, TN 37743

TERRAPIN CORPORATION

c/o David Kelley  
11958 Monarch Street  
Garden Grove, CA 92641

TEXAS ADVISORY COMMISSION ON  
STATE EMERGENCY COMMUNICATIONS

c/o Dan Morales  
P.O. Box 12548, Capitol Station  
Austin, TX 78711-2548

GREATER HARRIS COUNTY  
9-1-1 EMERGENCY NETWORK  
c/o Laverne Hogan  
602 Sawyer, Suite 710  
Houston, TX 77007

NATIONAL EMERGENCY NUMBER  
ASSOCIATION-TEXAS CHAPTER  
c/o J. Ross Sherohman  
P.O. Box 632911  
Nacogdoches, TX 75963-2911

TRW, Inc.  
c/o Norman P. Leventhal  
Daid S. Keir  
Leventhal, Senter & Lerman  
2000 K Street, N.W., Suite 600  
Washington, D.C. 20006

US WEST, INC.  
c/o Jeffrey S. Bork  
1020 19th Street, N.W.  
Suite 700  
Washington, D.C. 20036

UNITED STATES CELLULAR CORPORATION  
c/o Peter M. Connolly  
Koteen & Naftalin  
1150 Connecticut Avenue, N.W.  
Washington, D.C. 20036

UNITED STATES COAST GUARD  
c/o J.D. Hersey, Jr.  
2100 2nd Street, S.W.  
Washington, D.C. 20593

UTC  
c/o Jeffrey L. Sheldon  
Thomas E. Goode  
1140 Connecticut Avenue, N.W.  
Suite 1140  
Washington, D.C. 20036

**ANACORTES POLICE DEPARTMENT**

c/o Michael L. King  
1011 12th Street  
Anacortes, WA 98221

**COWLITZ COUNTY TECHNICAL SERVICES CENTER**

c/o Richard L. Bullock  
312 S.W. First Avenue  
Kelso, WA 98626-1724

**DEPARTMENT OF COMMUNITY, TRADE  
AND ECONOMIC DEVELOPMENT**

c/o Robert G. Oenning  
P.O. Box 48346  
Olympia, WA 98504-8346

**KING COUNTY E911 PROGRAM OFFICE**

c/o Marlys R. Davis  
700 Fifth Avenue, Suite 2300  
Seattle, WA 98104-5002

**KING COUNTY POLICE COMMUNICATIONS**

c/o Captain John W. Beard  
516 Third Avenue  
Seattle, WA 98104-2312

**PENINSULA COMMUNICATIONS**

**PORT ANGELES POLICE DEPARTMENT**

c/o Naomi L. Wu  
321 East 5th Street  
Port Angeles, WA 98362

**SAN JUAN COUNTY**

c/o David L. Zeretzke  
350 Court Street, #5  
Friday Harbor, WA 98250

**THURSTON COUNTY DEPARTMENT  
OF COMMUNICATIONS**

c/o James C. Quackenbush  
2000 Lakeridge Drive, S.W.  
Olympia, WA 98502

WASHINGTON TRACER

OREGON TRACER

c/o Arthur A. Butler

Sara Siegler-Miller

Ater, Wynne, Hewitt, Dodson & Skerritt

601 Union Street, Suite 5450

Seattle, WA 98101-2327

WATERWAY COMMUNICATIONS SYSTEMS, INC.

c/o Martin W. Bercovici

Keller and Heckman

1001 G Street, N.W.

Suite 500W

Washington, D.C. 20001-4545

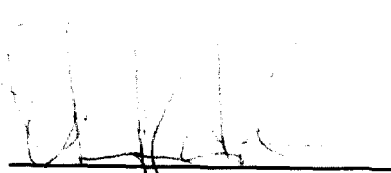
WESTINGHOUSE ELECTRIC CORPORATION

Electronic Systems Group

c/o James Carlsen

P.O. Box 756 - MS A475

Baltimore, MD 21203



---

Alejandro A. Calderón